JORGENSENFORGE

ALUMINUM – TITANIUM – SPECIALTY STEELS

8531 EAST MARGINAL WAY SOUTH
SEATTLE, WASHINGTON 98108

PHONE (206) 762-1100 FAX (206) 763-0848

April 7, 2015

Ms. Becky Chu
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

SUBJECT: RESPONSE TO EPA COMMENT ON REVISED DRAFT ADDENDUM TO THE OMMP
Jorgensen Forge Early Action Area Removal Action
Seattle, Washington
U.S. EPA Docket No. CERCLA 10-2013-0032

Dear Ms. Chu:

Jorgensen Forge Corporation (JFC) is responding to U.S. Environmental Protection Agency's (EPA) March 11, 2015 comments on Earle M. Jorgensen's (EMJ) Revised Draft Addendum to the Operations, Monitoring, and Maintenance Plan (OMMP), dated November 20, 2014. EPA expressed concern that EMJ's proposed sample locations of stormwater discharging from the existing JFC treatment system are not representative of stormwater discharge from the JFC property to the Duwamish Waterway, and upholded Outfall 3 as the appropriate sample collection point.

JFC agrees with EPA that EMJ's proposed sample location at LTR-4 is not representative of stormwater quality or the stormwater-to-sediment pathway associated with the JFC facility. However, obtaining samples directly from the Outfall 3 discharge is also not representative of stormwater quality discharging from the JFC treatment system, and would thereby not allow EPA to accurately evaluate the stormwater-to-sediment pathway associated with the JFC facility. Our opinion is based on the following observations and engineering controls in place:

- The existing storm sewer network intercepts stormwater runoff from pervious and impervious surfaces at the JFC facility and conveys intercepted stormwater to a treatment system, which treats facility stormwater in accordance with the state Industrial General Stormwater Permit (state-equivalent NPDES) and Ecology Agreed Order No. 8682. The collected stormwater is treated for turbidity, and organic and inorganic constituents prior to discharge at Outfall 3. In accordance with JFC's permit, stormwater effluent is sampled and analyzed monthly for comparison to permit benchmarks.

- The existing stormwater treatment system was upgraded in August 2014, concurrent with completion of EMJ's bank removal action, and the upgraded system came online prior to the seasonal "first flush" rainfall event in October 2014. JFC's stormwater sampling results from August 22, 2014 to March 23, 2015 have consistently met permit benchmarks for discharging stormwater to the Duwamish Waterway for the following constituents: arsenic, cadmium, chromium, copper, lead, mercury, silver, PCBs, bis (2-ethylhexyl) phthalate, total petroleum hydrocarbons, and turbidity.

- Facility stormwater exceeded the permit benchmark for total zinc between December 2014 and February 2015, and corrective actions are scheduled for implementation during Second Quarter 2015. However, 82 to 100 percent of the total zinc detected in the treated effluent was dissolved-phase zinc, which would not necessarily be correlated to total zinc concentrations detected in suspended solids, sediment, and bank material deposits in proximity to Outfall 3.

- Outfall 3 is situated below the Mean Higher High Water (MHHW) elevation, and is inundated daily by tidal fluctuations in the Duwamish Waterway. Therefore, water, suspended solids, and dissolved constituents within the Outfall 3 discharge pipe are not representative of treated stormwater discharged from the Jorgensen Forge property, but are instead representative of either undifferentiated surface waters of the Lower Duwamish Waterway, or the mixing of treated stormwater with surface waters of the Lower Duwamish Waterway. The water, suspended solids, and dissolved constituents collected from the JFC treatment system's effluent sampling port are more representative of the quality of stormwater that is discharged to the surface waters of the Lower Duwamish Waterway.

- Sediment and bank materials below Outfall 3 are also below MHHW elevation, and are submerged daily by the tidal fluctuations of the Lower Duwamish Waterway. The Lower Duwamish Waterway is the recipient of treated and untreated stormwater discharge and suspended particulate loads from multiple industrial outfalls upstream and downstream from the JFC Property; therefore, sediment and bank material deposits in proximity to Outfall 3 are attributable to other sources upstream and downstream from the JFC Property, and not necessarily representative of suspended solids and dissolved constituents in treated stormwater discharged from the JFC facility.

- The invert elevation of Outfall 3 is below MHHW, but elevated above the finish bank elevation. Discharge of stormwater and tidal incursion waters from Outfall 3 is associated with continuously variable erosional energies that depend on changing combinations of factors including but not limited to: tidal submersion, immersion, and emergence; rate of precipitation; treatment system pump discharge cycles; and, freeze/thaw cycles. Under these circumstances, conditions favorable for sediment deposition below Outfall 3 are more likely to occur when little or no stormwater is discharged from the facility. Therefore the quality of sediment deposits found in the vicinity of Outfall 3 would not be a reliable indicator of the stormwater-to-sediments pathway for upland stormwater quality discharging from the treatment system.

JFC appreciates the opportunity to express its concerns to EPA about the scope, accuracy, and data quality objectives of the post-removal action monitoring plan for the Jorgensen Forge Early Action Area.

Respectfully,

Miles Dyer
Director, Environmental, Health and Safety Programs
Director of Engineers

cc: Mr. Gil Leon, Earle M. Jorgensen
Ms. Amy Essig-Desai, Farallon Consulting, L.L.C.
Mr. Ryan Barth, Anchor QEA, LLC
Ms. Romy Freier-Coppinger, Washington Department of Ecology
Mr. Glen St. Amant, Muckleshoot Tribe

Ms. Alison O'Sullivan, Suquamish Tribe
Mr. James Rasmussen, DRCC/TAG
Ms. Jessica Winter, NOAA
Mr. Brian Anderson, The Boeing Company
Ms. Deborah Gardner, SoundEarth Strategies, Inc.

DHG:MD